

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
RICHARD DOHERTY,)	
)	
Plaintiff)	C.A. No. 1:11-cv-10953-GAO
)	
v.)	
)	
THOMAS M. GUERINO, in both)	
his individual and official capacity, and)	
the TOWN OF BOURNE,)	
)	
Defendants)	
_____)	

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

Counsel for the parties to the above-captioned matter have conferred and now file this joint statement pursuant to Local Rule 16.1(d). The scheduling conference is to be held on December 19, 2011.

I. Proposed Pretrial Schedule:

The parties agree that all discovery shall be limited in accordance with Fed. R. Civ. P. 26(b) and Local Rule 26.1(c). The parties further agree on the following proposed joint discovery plan:

1. Initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure to be filed by January 31, 2012.
2. Non-expert discovery completed by August 1, 2012.

3. Expert discovery schedule: to be set after Court ruling on any dispositive motions.

The parties do not believe that phased discovery is necessary in this case.

B. Motions

The parties propose that dispositive motions shall be filed no later than October 1, 2012. After the Court rules on dispositive motions, the parties request a status conference be scheduled to discuss expert discovery deadlines.

- C. Final pretrial conference and trial date to be scheduled by the Court.

II. Trial By Magistrate Judge

The parties *do not* consent to trial by a Magistrate Judge at this time.

III. Certifications

The parties will file their respective certifications pursuant to Local Rule 16.1(d)(3) under separate cover.

IV. Settlement Proposal

Pursuant to Local Rule 16.1(c), Plaintiff submitted a written settlement proposal to Defendant on December 8, 2011.

Respectfully submitted,

The Plaintiff,
RICHARD DOHERTY,
By his attorneys

The Defendants,
Thomas M. Guerino, in both his individual and
official capacity, and the Town of Bourne
By their attorneys,

MORRISON MAHONEY LLP

/s/ Harold L. Lichten
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Dated: December 14, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served upon the Court and counsel of record for defendants via the Court's ECF filing system, on December 14, 2011.

/s/ Harold L. Lichten
Harold Lichten, Esq.